

QA-21434

FHWA-97-2350-21

Torngton Enterprises, Inc.
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Federal Highway Adm.
Dept. of Trans. Rm. 4232
Washington, D.C. 20590

LEIS./REGS. DIV.

ADMINISTRATION

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To Whom it may Concern,

I am writing this in hope that my point of view, as a life time truck driver will assist you in setting regulations on the new hour of service for drivers.

A little of my back ground may help you understand my opinion better. I have drove (truck) since I was 16 years old, now I'm 56 years old. I have drove company trucks, been an owner-operator, now I'm an independent with my own authority. While in the U.S. Army I drove about 800,000 miles in Europe.

My opinion is the hours of service is for the safety of the driver and the public using our highways. Therefore just changing the log book to benefit a few will be

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a disaster. The last time this issue came up, the big trucking companies wanted to be able to reset the clock after the driver had been off duty for 24 hours. They claimed this would enable them to get their drivers home more often. I agree it would if it was used that way, but everyone in the trucking industry knows a driver could be put up in a cheap motel, or left in a truck stop for 24 hours, therefore allowing the company to run the driver another 70 hours. I do not believe this is the only problem. Another item which contributes to driver fatigue that I see everyday, is drivers who have driven all night to deliver their load on time only to find out from the receiver that they must break the pallets down, or build the pallets up, to ~~fit~~ fit warehouse racks. After completing this, which takes anywhere between 2 and 6 hours. His dispatcher then sends him across the city or halfway across the state to pick up another load which he must assist in loading. The driver is then informed that his new load

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must be delivered 5 to 6 hundred miles away the next morning. This driver has lagged at the very most 1 hour for unloading and reloading, plus his driving distance between unloading and loading. This comes down to, the driver has driven 10 hours to deliver the first load, spent another 8 to 10 hours that day to deliver and pick up his next load. Now he is expected to drive another 8 to 10 hours to deliver the 2nd load. This means in 36 hours this driver has worked between 28 and 30 hours. When you figure his stops for eating, fueling, and use of restrooms; when did he sleep?

In the eyes of public safety this has to be stopped. I would agree to resetting the clock after the driver has had 24 hours off at home. This would eliminate using cheap motels, and truck stops for resetting the clock and force the companies to get the drivers home as they stated they could. I also propose that a regulation be passed

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and strictly enforced against drivers loading and unloading their trucks. I propose any driver caught unloading or loading their truck be fined \$1,000.00 and the warehouse allowing such drive to load or unload their truck be fined \$10,000.

My last proposal will accomplish 3 things it will force the warehouses to hire their own help, it will cut down on drivers fatigue, and last but not least it will stop the lumpers from collecting federal assistance while working for cash and not paying tax on it.

I hope that my opinion will ~~help~~ help you in setting new hours of service rules which will be fair to the drivers, and the companies and more safe for all the people using this nations highways.

Sincerely yours,
Livingston Enterprises, Inc.
Robert S. Livingston ST
John Livingston President

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